

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**IN RE EUROPEAN GOVERNMENT BONDS
ANTITRUST LITIGATION**

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Lead Case No. 1:19-cv-2601

Hon. Victor Marrero

**PLAINTIFFS' NOTICE OF MOTION FOR PRELIMINARY APPROVAL OF
STIPULATION AND AGREEMENT OF SETTLEMENT WITH
UNICREDIT BANK AG AND STIPULATION AND AGREEMENT OF SETTLEMENT
WITH NATIXIS S.A.**

PLEASE TAKE NOTICE that Plaintiffs Ohio Carpenters' Pension Fund, Electrical Workers Pension Fund Local 103 I.B.E.W., and San Bernardino County Employees' Retirement Association (collectively, "Plaintiffs") will, and hereby do, move the Court pursuant to Federal Rule of Civil Procedure 23(e) for an order:

- (1) preliminarily approving the proposed settlement with UniCredit Bank AG;
- (2) preliminarily approving the proposed settlement with Natixis S.A.;
- (3) approving Huntington National Bank as Escrow Agent;
- (4) approving A.B. Data, Ltd. as Claims Administrator;
- (5) approving proposed forms of notice to the proposed settlement class; and
- (6) authorizing notice as provided in the Order.

Submitted herewith in support of this motion are the:

- (1) Plaintiffs' Memorandum of Law in Support of Motion for Preliminary Approval of Stipulation and Agreement of Settlement with UniCredit Bank AG and Stipulation and Agreement of Settlement with Natixis S.A.; and

- (2) Joint Declaration of Kristen M. Anderson, Vincent Briganti, Gregory S. Asciolla, and Todd A. Seaver in Support of Plaintiffs' Motion for Preliminary Approval of Stipulation and Agreement of Settlement with UniCredit Bank AG and Stipulation and Agreement of Settlement with Natixis S.A.

Dated: May 12, 2023

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CERTIFICATE OF SERVICE

I hereby certify that on May 12, 2023, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

s/ *Kristen M. Anderson*
Kristen M. Anderson